

JS 44 (Rev. 10/20)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

George Jones

(b) County of Residence of First Listed Plaintiff Philadelphia  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Wesley Cornish, Cornerstone Legal Group 230 S Broad  
St, 17th FL Philadelphia, PA 19102 P:888-313-1385**DEFENDANTS**

Police Officer Eugene Roher

County of Residence of First Listed Defendant Philadelphia  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

City Law Department 1515 Arch Street, 14th Floor Phila, PA  
19102**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RS1 (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. § 1983, 20 U.S.C. § 1681

Brief description of cause:

Deprivation of Federal Civil Rights

**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

March 28, 2023

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE



UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

*(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)*

Address of Plaintiff: 230 South Broad Street, 17th Floor Philadelphia, PA 19102  
 Address of Defendant: 1515 Arch Street 14th Floor Philadelphia, PA 19102  
 Place of Accident, Incident or Transaction: 2900 Block of West Memphis Street Philadelphia, PA

**RELATED CASE, IF ANY:**

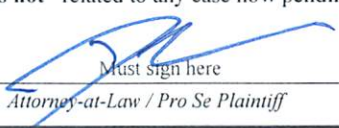
Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 12/24/2023

  
Must sign here  
Attorney-at-Law / Pro Se Plaintiff

310865

Attorney I.D. # (if applicable)

**CIVIL: (Place a ✓ in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
  - ☐ 2. FELA
  - ☐ 3. Jones Act-Personal Injury
  - ☐ 4. Antitrust
  - ☐ 5. Patent
  - ☐ 6. Labor-Management Relations
  - ☒ 7. Civil Rights
  - ☐ 8. Habeas Corpus
  - ☐ 9. Securities Act(s) Cases
  - ☐ 10. Social Security Review Cases
  - ☐ 11. All other Federal Question Cases
- (Please specify): \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☐ 1. Insurance Contract and Other Contracts
  - ☐ 2. Airplane Personal Injury
  - ☐ 3. Assault, Defamation
  - ☐ 4. Marine Personal Injury
  - ☐ 5. Motor Vehicle Personal Injury
  - ☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_
  - ☐ 7. Products Liability
  - ☐ 8. Products Liability – Asbestos
  - ☐ 9. All other Diversity Cases
- (Please specify): \_\_\_\_\_

**ARBITRATION CERTIFICATION**

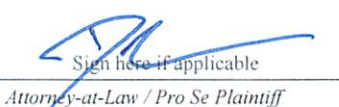
*(The effect of this certification is to remove the case from eligibility for arbitration.)*

I, David Wesley Cornish, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: 12/24/2023

  
Sign here if applicable  
Attorney-at-Law / Pro Se Plaintiff

310865

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

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<b>George Jones, Plaintiff,</b>	:	<b>United States District Court</b>
<b>vs.</b>	:	<b>Eastern District of Pennsylvania</b>
	:	<b>Civil Division – Civil Rights</b>
<b>Police Officer Eugene Roher, Defendant.</b>	:	<b>Case No.: _____</b>

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### **COMPLAINT**

1. Plaintiff George Jones (“Jones”) via counsel, David Wesley Cornish, Esquire, Complains and states he was injured as follows, and via 42 U.S.C. §§1983, 1985, and 1988, of the civil rights laws passed by Congress, provides the appropriate remedy to persons who have been deprived of their federal constitutional statutory rights under the color of state law.

### **JURISDICTION AND VENUE**

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 (federal question) and the Civil Rights Act of 1871, 42 U.S.C. §§1983, 1985, and 1988.
3. This Court has supplemental jurisdiction for the state law claims, pursuant to 28 U.S.C. §1367.
4. Venue is proper in this district pursuant to 28 U.S.C. §1391(b) in that Defendants work and reside in this district and virtually all the acts described in this Complaint occurred in this district.

### **PLAINTIFF**

5. Plaintiff is **George Jones**, an individual and resident of the United States of America, and the Commonwealth of Pennsylvania and the City of Philadelphia.

### **DEFENDANTS**

6. Defendant is **Police Officer Eugene Roher**, a police officer for the Philadelphia Police Department, who lives and resides in the Commonwealth of Pennsylvania.

### **FACTUAL BACKGROUND**

7. At all relevant times, the Defendants acted under the color of law as a municipality supervising municipally employed police officers while on duty.

8. On or about October 25, 2023, Defendant Roher who was employed as a Philadelphia Police Officer and acting under the color of law when he encountered the Plaintiff.
9. Defendant Roher claims to have seen the Plaintiff, and Collin Kulb, in the area of the 2900 Block of West Memphis Street in Philadelphia, Pennsylvania.
10. Defendant Roher claimed to have seen Alfredo Martinez, approach Plaintiff, engage in a conversation, and then Mr. Martinez handed Plaintiff money in exchange for small unknown items.
11. According to Defendant Roher's claims, after staying in the area for approximately 5 minutes, Mr. Martinez left and was stopped by other officers and a glass pipe were allegedly retrieved, with *no* narcotics or other contraband.
12. Defendant Roher claims due to Mr. Martinez's stop, he ordered the arrest "takedown" for Mr. Kulb and the Plaintiff.
13. Defendant Roher claims Mr. Kulb was stopped and alleged marijuana was recovered from on and/or near his person in addition to Plaintiff, who allegedly had heroin, cocaine, oxycodone, and marijuana.
14. Defendant Roher never claims in any testimony and/or police paperwork to have seen let alone overheard any alleged conversation between Mr. Kulb and Plaintiff.
15. Defendant Roher never alleged in any testimony and/or police paperwork Mr. Kulb and/or Plaintiff exchanged any money or objects between themselves.
16. Defendant Roher never alleged Mr. Kulb received and/or exchanged any money or objects with any alleged buyer.
17. Defendant Roher never alleged in any testimony and/or police paperwork Mr. Kulb spoke or had a conversation with any alleged buyer.
18. Defendant Roher is the only person to have seen the alleged narcotics transaction between Mr. Martinez and the Plaintiff.
19. Defendant Roher did not record any observations on video or audio he allegedly made of Plaintiff.

20. Plaintiff as a result solely of Defendant Roher's observations and communications was arrested and charged<sup>1</sup> by law enforcement agents with possession of a controlled substance<sup>2</sup> and conspiracy<sup>3</sup>.
21. Plaintiff was held in police custody prior to being granted ROR bail.
22. On November 9, 2023, Plaintiff had to appear in court related to the underlying criminal matter.
23. On December 21, 2023, the Honorable Lydia Kirkland dismissed all charges against the Plaintiff.
24. Plaintiff denies ever having "conspired" to sell and/or possess narcotics with Mr. Kulb.
25. Plaintiff denies at the time of the incident ever selling and/or possessing any illegal narcotics.

#### **PLAINTIFF'S INJURIES**

26. Plaintiff alleges and incorporates via reference the allegations contained in all the above paragraphs, as fully as though the same were set forth herein at length.
27. Due to the Defendants actions Plaintiff suffered the following injuries:
- a. Physical discomfort from being arrested;
  - b. A loss of enjoyment and quality of life due to the Defendants actions in injuring him which caused physical and psychological injuries;
  - c. A loss of employment/business opportunities, in particular his job with FedEx due to the Defendants actions injuring him;
  - d. Loss of opportunities to continue his education and training;
  - e. Inconvenience, embarrassment, shame, and anxiety from Plaintiff's arrest and prosecution;
  - f. Litigation expenses for this civil matter including but not limited to filing fees, administrative fees, expert fees, court costs, civil counsel fees, and the like.

#### **COUNT 1 – FALSE IMPRISONMENT & FALSE ARREST**

28. Plaintiff alleges and incorporates via reference the allegations contained in all the above paragraphs, as fully as though the same were set forth herein at length.

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<sup>1</sup> MC-51-CR-19192-2023

<sup>2</sup> 35 Pa.C.S.A. 780-113(a)(16)

<sup>3</sup> 18 Pa.C.S.A. §903

29. Plaintiff avers they were searched and seized within the meaning of the United States Constitution's 4<sup>th</sup> Amendment as applied to the states via the 14<sup>th</sup> Amendment by the Defendants, during this incident.
30. Plaintiff avers his initial detention and arrest were illegal as it was not based on probable cause he was committing a crime as Plaintiff was within his fixed place of business.
31. Plaintiff avers his continued detention, after his arrest and the forwarding of criminal charges constituted a false imprisonment, as this was directly linked to his arrest, where no probable cause existed.
32. Plaintiff avers his seizure and resultant arrest by Defendants was illegal and improper because the Defendant knowingly lacked a reasonable suspicion, and/or probable cause to believe he was committing a criminal offense.
33. Plaintiff avers the police lacked probable cause to arrest them and they were falsely imprisoned pursuant to their arrests pursuant to the 4th Amendment of the United States Constitution against unjust seizures.
34. Plaintiff avers but for the Defendants' actions, he otherwise would not have been subjected to a search, seizure, arrest, and prosecution pursuant to the 4th Amendment of the United States Constitution.
35. The Defendant directly, foreseeably, legally, and proximately caused Plaintiffs to have suffered unjust, unwarranted, and unlawful incarceration, prosecution, and/or will continue to suffer the following damages: Physical Injuries including pain and suffering, Public shame and embarrassment, Past and future costs for medical treatment and care, Loss of enjoyment of freedom, Loss of employment/educational opportunities and wages, Loss of wages, Loss of enjoyment of life, Loss of enjoyment of freedom, and Past and future pain and suffering, inconvenience, and emotional distress.
- WHEREFORE**, Plaintiff demands judgment against Defendants, in an official, professional, individual, and personal capacity, individually, jointly, and severally for compensatory, punitive, and exemplary damages in addition to attorneys' fees, costs, interest, and the like in excess of one hundred and fifty-thousand dollars (\$150,000).



**COUNT 2 – MALICIOUS PROSECUTION**

36. Plaintiff alleges and incorporates via reference the allegations contained in all the above paragraphs, as fully as though the same were set forth herein at length.
37. Plaintiff avers the Defendant initiated criminal proceedings in the underlying criminal case, against him via arrest, filing a criminal complaint, processing him, and consulting the District Attorney's Office about further charging him.
38. Plaintiff avers the Defendant lacked probable cause, as articulated in the United States Constitution's 4<sup>th</sup> Amendment and applied to the states via the 14<sup>th</sup> Amendment, to stop, search, and detain Plaintiffs when they first encountered him, and lacked probable cause to arrest and because the Defendants arrested him, his resulting imprisonment was unjust, illegal, and was the direct and causal reason he was incarcerated.
39. Plaintiff's criminal charges terminated in his favor when all charges were dismissed.
40. Plaintiff avers the Defendants acted maliciously or for a purpose other than bringing him to justice, as Plaintiff was not committing a crime when he first encountered the Defendant.
41. Plaintiff avers because of this criminal proceeding; he suffered a significant deprivation of liberty and freedom spending time in pre-trial incarceration.
42. Further, Plaintiff avers Defendants obscured the District Attorney's Office from making an independent judgment about the merits of prosecution as these Defendants failed to provide materially honest evidence and statements regarding Plaintiffs, the evidence observed, and recovered.
43. Plaintiff avers but for the Defendants filing a criminal complaint based on a gross misapplication of clearly stated law, and/or fabricated/non-existent evidence, he would never have had a criminal case initiated against him.
44. The Defendants directly, foreseeably, legally, and proximately caused Plaintiffs to have suffered unjust, unwarranted, and unlawful incarceration, prosecution, and/or will continue to suffer the following damages: Physical injuries including pain and suffering, Public shame and embarrassment, Loss of

enjoyment of life, Loss of enjoyment of freedom, Loss of employment/educational opportunities and wages, and Past and future pain and suffering, extreme inconvenience, and emotional distress.

**WHEREFORE**, Plaintiff demands judgment against Defendants, in an official, professional, individual, and personal capacity, individually, jointly, and severally for compensatory, punitive, and exemplary damages in addition to attorneys' fees, costs, interest, and the like in excess of one hundred and fifty-thousand dollars (\$150,000).

**PUNITIVE DAMAGES REQUEST**

45. Plaintiff alleges and incorporates via reference the allegations contained in all the above paragraphs, as fully as though the same were set forth herein at length.

46. Defendants actions in depriving Plaintiff of his rights, freedoms, privileges, and liberties is so outrageous as to shock the conscience of reasonable persons and shows reckless indifference for the Plaintiff's rights, especially when there was no reasonable suspicion or probable cause to believe he was committing a criminal act by carrying a legally purchased and owned weapon while working at his fixed place of business, and when asked told the police the same and was still imprisoned.

**WHEREFORE**, Plaintiffs demand exemplary and punitive damages plus attorneys' fees and costs in an amount in excess of One-Hundred and Fifty-Thousand Dollars (\$150,000) against all Defendants officially, personally, professionally, individually, jointly, and severally.

**JURY DEMAND**

47. Plaintiff alleges and incorporates via reference the allegations contained in all the above paragraphs, as fully as though the same were set forth herein at length.

48. Plaintiffs demand a jury to determine the extent of damages and provide a full and fair determination pursuant to the United States Constitutional Amendments V, VI, and XIV.



Respectfully Submitted,



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/S/ David Wesley Cornish, Esquire

David Wesley Cornish, Esquire

Bar ID #: 310865

Cornerstone Legal Group, LLC

230 South Broad Street, 17<sup>th</sup> Floor

Philadelphia, PA 19102

Phone: 212-444-2039

**ATTORNEY FOR PLAINTIFF JONES**

**DATE:** December 24, 2023

<b>George Jones, Plaintiff,</b>	:	<b>United States District Court</b>
<b>vs.</b>	:	<b>Eastern District of Pennsylvania</b>
	:	<b>Civil Division – Civil Rights</b>
<b>Police Officer Roher, Defendant.</b>	:	<b>Case No.: _____</b>

**VERIFICATION**

The facts set forth in the foregoing Complaint are true and correct to the best of the undersigned's knowledge, information and belief and are verified subject to the penalties for perjury and unsworn falsification to authorities and/or the tribunal.

Respectfully Submitted,



\_\_\_\_\_  
/S/ David Wesley Cornish, Esquire  
David Wesley Cornish, Esquire  
Bar ID #: 310865

Cornerstone Legal Group, LLC  
230 South Broad Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102

Phone: 212-444-2039

**ATTORNEY FOR PLAINTIFF JONES**

**DATE:** December 24, 2023